

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

No. 18-CR-03989 WJ

vs.

ALLISTER QUINTANA,

Defendant.

DEFENDANT'S UNOPPOSED MOTION TO EXTEND DEADLINES

Defendant Allister Quintana, through his attorney, Ray Twohig, moves that deadlines for counsel to file sentencing memoranda be extended. The grounds are as follows.

1. Several sentencing dates have been set, then modified. The current sentencing date is January 5, 2021.
2. Prior to the most recent rescheduling of the sentencing date, this Court set deadlines for the defense sentencing memorandum at October 2, 2020 and for the Government Response at October 16, 2020.
3. Undersigned counsel continues to await the report of Dr. Christine Johnson on the psychological evaluation of Mr. Quintana. She has worked diligently on the evaluation despite being unable to meet personally with Mr. Quintana at the McKinley County Detention Center, where he remains incarcerated. She has been able to obtain the cooperation of staff at the detention center to allow online meetings with Mr. Quintana, of which there have been several. She has assured

counsel she will be able to complete her evaluation and report by October 14, 2020. Counsel can then complete his sentencing memorandum by November 1, 2020 and the Government can complete its response by November 15, 2020.

4. Extension of these dates is requested.

Assistant United States Attorney Joseph Spindle does not oppose this motion.

Respectfully submitted,

/s/ Ray Twohig

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I hereby certify that on the 2nd day of October, 2020, I filed the foregoing electronically through the CM/ECF system, which caused all parties and counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Ray Twohig

Ray Twohig